

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA §
§
V. § CAUSE NO. 4:18-CR-368
§
SCOTT BREIMEISTER (02) §

DEFENDANT'S UNOPPOSED MOTION TO MODIFY BOND

TO UNITED STATES DISTRICT JUDGE ALFRED H. BENNETT:

Scott Breimeister, defendant, files Defendant's Unopposed Motion To Modify Bond, and would show as follows:

I.

Breimeister has been on pretrial release without incident since June of 2018.

After a six-week trial, the Court declared a mistrial on December 13, 2022. The denial of a Double Jeopardy motion is on appeal to the Fifth Circuit.

Breimeister's newest pretrial supervision officer has requested paystubs to prove that he is employed. His employment history and professional skills mainly involve structuring and managing investment opportunities, primarily in the real estate space. That type of work usually does not generate regular income and paystubs. Since this case arose, he has been self-employed. Being under indictment for fraud for five years makes it impossible to obtain a bank loan for real estate projects. Market conditions since Covid make it difficult to find sound investment

opportunities. In short, he has no paystubs to give his officer.

Breimeister requests that the Court modify his conditions of release to eliminate the requirement that he maintain employment. Counsel has conferred with the lead prosecutor, Dan Griffin, and he does not oppose this request.

Breimeister respectfully requests that the Court grant this motion.

Respectfully submitted,

/s/ Josh Schaffer
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Attorney for Defendant
SCOTT BREIMEISTER

CERTIFICATE OF CONFERENCE

I conferred with Dan Griffin, the lead prosecutor, on August 4, 2023, and he does not oppose this request.

/s/ Josh Schaffer
Josh Schaffer

CERTIFICATE OF SERVICE

I served this document on all parties by electronic filing on August 20, 2023.

/s/ Josh Schaffer
Josh Schaffer